

EXHIBIT C

**Verification to Complaint in *Wachovia Bank, N.A. v. Spivey*, Philadelphia County Court
of Common Pleas, Case No. 07-004303, 12.28.07**

VERIFICATION

I hereby states that I am the attorney for the Plaintiff in this matter, that Plaintiff is outside the jurisdiction of the Court and/or the verification could not be obtained within the time allowed for the filing of the pleading, that I am authorized to make this verification pursuant to Pa.R.C.P. 1024 (c), and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are based upon information supplied by Plaintiff and are true and correct to the best of my knowledge, information and belief.

The undersigned understands that this statement is made subject to the penalties of 18 Pa.C.S. Sec. 4904 relating to unsworn falsifications to authorities.



Attorney for Plaintiff

DATE: 12/28/07

**Praeceptum to Substitute Verification to Complaint
in Wachovia Bank, N.A. v. Spivey, Philadelphia County Court of Common Pleas,
Case No. 07-004303, 3.12.08**

PHELAN HALLINAN & SCHMIEG, LLP
By: Francis S. Hallinan, Esquire
IDENTIFICATION NO. 62695
1617 JFK Boulevard, Suite 1400
PHILADELPHIA, PA 19103
(215) 563-7000

ATTORNEY FOR PLAINTIFF

WACHOVIA BANK, N.A., AS
TRUSTEE FOR PARK PLANE
SECURITIES, INC., ASSET-
BACKED PASS-THROUGH
CERTIFICATES SERIES 2004-
WWF1, UNDER THE POOLING AND
SERVICING AGREEMENT, DATED AS
OF NOVEMBER 1, 2004

Plaintiff

: Philadelphia County
:
: Court of Common Pleas
:
: CIVIL DIVISION
:
: NO. 004303
:
: December Term 2007
:
:

vs.

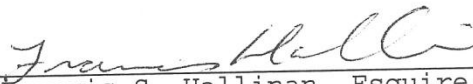
Laurine Spivey

Defendant(s)

PRAECEPTUM TO SUBSTITUTE VERIFICATION
TO CIVIL ACTION COMPLAINT
IN MORTGAGE FORECLOSURE

TO THE PROTHONOTARY:

Kindly substitute the attached verification for the
verification originally filed with the complaint in the instant
matter.


Francis S. Hallinan, Esquire
Attorney for Plaintiff

Dated: 3-12-08

**Foreclosure Complaint in *Wells Fargo Bank, N.A. v. Wolferd*,
Court of Common Pleas for Lancaster County, Pennsylvania, Case No. 04-11635.
12.15.04**

009 10:31 From:

To: 18562222912

P.5/9

6. The following amounts are due on the mortgage:

04

Principal Balance	\$119,642.93
Interest	\$,093.52
05/01/2004 through 12/14/2004 (Per Diem \$22.34)	
Attorney's Fees	1,250.00
Cumulative Late Charges	0.00
03/29/2001 to 12/14/2004	
Cost of Suit and Title Search	\$ 550.00
Subtotal	\$ 126,536.45
Escrow	
Credit	0.00
Deficit	209.52
Subtotal	\$ 209.52
TOTAL	\$ 126,745.97

7. The attorney's fees set forth above are in conformity with the mortgage documents and Pennsylvania law, and will be collected in the event of a third party purchaser at Sheriff's Sale. If the Mortgage is reinstated prior to the Sale, reasonable attorney's fees will be charged.
8. This action does not come under Act 6 of 1974 because the original mortgage amount exceeds \$50,000.
9. This action does not come under Act 91 of 1983 because the mortgage is FHA-insured.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 126,745.97, together with interest from 12/14/2004 at the rate of \$22.34 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

PHELAN HALLINAN & SCHMIEG

By:

Francis S. Hallinan
Francis S. Hallinan

LAWRENCE T. PHELAN, ESQUIRE

FRANCIS S. HALLINAN, ESQUIRE

Attorneys for Plaintiff

**Cover Sheet for Foreclosure Complaint in *Wells Fargo Bank, N.A. v. Wolferd*,
Court of Common Pleas for Lancaster County, Pennsylvania,
Case No. 04-11635, 12.15.04**

LANCASTER COUNTY

04-11635

OFFICE OF THE PROTHONOTARY

COURT OF COMMON PLEAS - CIVIL

CIVIL COVER SHEET

NAME, ADDRESS AND TELEPHONE NUMBER OF PLAINTIFF'S ATTORNEY:

FRANCIS S. HALLINAN, ESQUIRE

SUITE 1400, ONE PENN CENTER

PHILADELPHIA, PA. 191023

(215) 563-7000

ATTORNEY'S SIGNATURE: F. S. Hallinan

IDENTIFICATION #: 62695

IN THE COURT OF COMMON PLEAS OF LANCASTER COUNTY

Court Administration Office

SCHEDULING INFORMATION ONLY

HEARING/CONFERENCE - LENGTH OF TIME (MIN/IRS):

SPECIAL INSTRUCTIONS: _____

File #: 108563

**Suggestion of Record Change in Wells Fargo Bank, N.A. v. Wolfred,
Court of Common Pleas for Lancaster County, Pennsylvania,
Case No. 04-11635, 7.8.09**

Phelan Hallinan & Schmieg, LLP
Lawrence T. Phelan, Esq., Id. No. 32227
Francis S. Hallinan, Esq., Id. No. 62695
Daniel G. Schmieg, Esq., Id. No. 62205
Michele M. Bradford, Esq., Id. No. 69849
Judith T. Romano, Esq., Id. No. 58745
Sheetal R. Shah-Jani, Esq., Id. No. 81760
Jenine R. Davey, Esq., Id. No. 87077
Lauren R. Tabas, Esq., Id. No. 93337
Vivek Srivastava, Esq., Id. No. 202331
Jay B. Jones, Esq., Id. No. 86657
Peter J. Mulcahy, Esq., Id. No. 61791
Andrew L. Spivack, Esq., Id. No. 84439
Jaime McGuinness, Esq., Id. No. 90134
Chrisovalante P. Fliakos, Esq., Id. No. 94620
Joshua I. Goldman, Esq., Id. No. 205047
Courtenay R. Dunn, Esq., Id. No. 206779
Andrew C. Bramblett, Esq. I.D. 208375
1617 JFK Boulevard, Suite 1400
One Penn Center Plaza
Philadelphia, PA 19103
215-563-7000

WELLS FARGO BANK, N.A. S/B/M TO WELLS
FARGO HOME MORTGAGE, INC.

vs.

EDWARD H. WOLFRED, JR.

LANCASTER COUNTY

COURT OF COMMON PLEAS

CIVIL DIVISION

No. CI-04-11635

SUGGESTION OF RECORD CHANGE
RE: CORRECTION OF DEFENDANT'S NAME

TO THE PROTHONOTARY:

I, the attorney for the Plaintiff, hereby certifies that, to the best of my knowledge, information and belief that the defendant's name was erroneously listed in the caption as:

EDWARD H. WOLFRED, JR.

Kindly change the information on the docket to read as follows:

EDWARD H. WOLFRED, JR. A/K/A EDWARD H. WOLFRED, JR.

DATE: 7/2/2009

PHELAN HALLINAN & SCHMIEG, LLP

By: [Signature]
Lawrence T. Phelan, Esq., Id. No. 32227
Francis S. Hallinan, Esq., Id. No. 62695
Daniel G. Schmieg, Esq., Id. No. 62205
Michele M. Bradford, Esq., Id. No. 69849
Judith T. Romano, Esq., Id. No. 58745
Sheetal R. Shah-Jani, Esq., Id. No. 81760
Jenine R. Davey, Esq., Id. No. 87077
Lauren R. Tabas, Esq., Id. No. 93337
Vivek Srivastava, Esq., Id. No. 202331
Jay B. Jones, Esq., Id. No. 86657
Peter J. Mulcahy, Esq., Id. No. 61791
Andrew L. Spivack, Esq., Id. No. 84439
Jaime McGuinness, Esq., Id. No. 90134
Chrisovalante P. Fliakos, Esq., Id. No. 94620
Joshua I. Goldman, Esq., Id. No. 205047
Courtenay R. Dunn, Esq., Id. No. 206779
Andrew C. Bramblett, Esq. I.D. 208375
Attorneys for Plaintiff

ENTERED AND FILED
2009 JUL -8 AM 11:42
PROTHONOTARY'S OFFICE
LANCASTER, PA

**Purported "Assignment" of Mortgage in *Bank of New York v. Upke*,
Superior Court, Chancery Division, for Atlantic County, New Jersey,
Docket No. F-10209-08. (See Complaint at ¶¶ 155-170)**

Case 1:09-cv-01710-JHR-JS Document 31-6 Filed 09/08/09 Page 4 of 4 PageID: 68

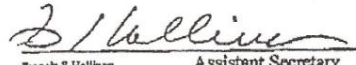
06/16/2008 15:48 FAX 16098890559

JEREMY TRECHOCK

003/003

I AGREE TO THE TERMS OF THIS ASSIGNMENT.

Witnessed or Attested by:


Francis S. Hallinan, Assistant Secretary
and Vice President of

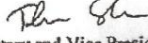
Mortgage Electronic Registration Systems Inc as a nominee for America's Wholesale
Lender its successors and assigns

NOTARY ACKNOWLEDGMENT

CAPACITY CLAIMED BY SIGNER: Assistant Secretary and Vice President

OF Mortgage Electronic Registration Systems Inc as a nominee for America's
Wholesale Lender its successors and assigns

STATE OF *Pennsylvania*
COUNTY OF *Philadelphia*

On, *3/14/08*, before me, , a Notary Public, personally
appeared Francis S. Hallinan Assistant Secretary and Vice President, who proved to me on the
basis of satisfactory evidence to be the person whose name is subscribed to the within instrument
and acknowledged that he/she executed the same in her authorized capacity and that by her
signature on the instrument, the entity upon behalf of which the person acted executed the
instrument.

WITNESS my hand and official seal.


Notary Public

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
THOMAS P. STRAIN, Notary Public
City of Philadelphia, Phila. County
My Commission Expires February 4, 2010

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
THOMAS P. STRAIN, Notary Public
City of Philadelphia, Phila. County
My Commission Expires February 4, 2010

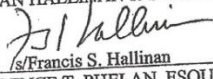
**Complaint in *Wachovia Bank, N.A. v. Bender*,
Court of Common Pleas for Berks County, Pennsylvania
Case No. 07-6730, 6.27.07**

Case 08-21193-ref Doc 56-3 Filed 06/26/09 Entered 06/26/09 16:26:32 Desc
Exhibit Page 22 of 30

9. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.
10. This action does not come under Act 6 of 1974 because the original mortgage amount exceeds \$50,000.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$78,017.75, together with interest from 06/22/2007 at the rate of \$22.48 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

PHELAN HALLINAN & SCHMIEG, LLP

By: 
s/Francis S. Hallinan
LAWRENCE T. PHELAN, ESQUIRE
DANIEL G. SCHMIEG, ESQUIRE
FRANCIS S. HALLINAN, ESQUIRE
Attorneys for Plaintiff


**"Verification" Attached to Complaint,
Wachovia Bank, N.A. v. Bender,
Court of Common Pleas for Berks County, Pennsylvania
Case No. 07-6730, 6.22.07**

Case 08-21193-ref Doc 56-3 Filed 06/26/09 Entered 06/26/09 16:26:32 Desc
Exhibit Page 25 of 30

VERIFICATION

FRANCIS S. HALLINAN, ESQUIRE hereby states that he is attorney for Plaintiff in this matter, that Plaintiff is outside the jurisdiction of the court and/or the verification could not be obtained within the time allowed for the filing of the pleading, that he is authorized to make this verification pursuant to Pa.R.C.P. 1024 (c), and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are based upon information supplied by Plaintiff and are true and correct to the best of its knowledge, information and belief. Furthermore, counsel intends to substitute a verification from Plaintiff upon receipt.

The undersigned understands that this statement is made subject to the penalties of 18 Pa.C.S. Sec. 4904 relating to unsworn falsifications to authorities.


Francis S. Hallinan, Esquire
Attorney for Plaintiff

DATE: 6/22/09

**Affidavit Dated January 7, 2008 in *First Horizon Loan Corp. v. Texiera*,
Docket No. 3:06-cv-00791-EMK (M.D.Pa.)**

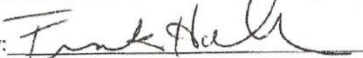
I verify that the statements made in this Affidavit are true and correct to the best of my knowledge, information or belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. *4904, relating to sworn falsification to authorities.

January 7, 2008
Date



FRANCIS S. HALLINAN, ESQUIRE

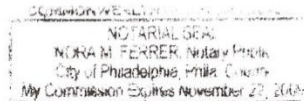
**Affidavit Dated July 1, 2006 in *First Horizon Loan Corp. v. Texiera*,
Docket No. 3:06-cv-00791-EMK (M.D.Pa.)**

PHELAN HALLINAN & SCHMIEG, LLP

by: 
Francis S. Hallinan, Esquire
Attorney for Plaintiff


Sworn to and Subscribed
Before Me this 1st
day of July, 2006


Nora M. Ferrer
Notary Public



**Affidavit of Amount Due in *Federal Home Loan Mortgage Corp. v. Harroll*,
Docket No. 4:04-cv-00363 (M.D.Pa.)**

FEDERMAN AND PHELAN

by: 
Francis S. Hallinan, Esquire
Attorney for Plaintiff

**Notice of Dismissal Filed in *Wells Fargo Bank, N.A. v. Connor*,
Docket No. 1:05-cv-02673-YK (M.D.Pa.)**

PHELAN HALLINAN & SCHMIEG, LLP

BY: 

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Attorney ID No. 62695
One Penn Center at Suburban Station
1617 JFK Blvd., Suite 1400
Philadelphia, PA 19013
P: 215-563-7000

Praecipe to Reissue Summons in *Mortgage Electronic Registration Systems, Inc. v. Vega*, Docket No. 3:04-cv-02571-RPC (M.D.Pa.)

PHELAN, HALLINAN & SCHMIEG LLP

BY: 

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Philadelphia, PA 19013
P: 215-563-7000